

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**JOSE MOURA, SR., PERSONAL
REPRESENTATIVE OF THE
ESTATE OF JOSE MOURA, JR.,
LORI TURNER, AS PARENT
AND NEXT FRIEND OF MINOR
PLAINTIFFS A.M., C. M., AND J.
M., LORI TURNER,
INDIVIDUALLY**

**PLAINTIFFS,
V.**

**NEW PRIME, INC., BARBARA
CANNON, ADMINSTRATOR OF THE
ESTATE OF JOHN PAUL CANNON,
SUCCESS LEASING, INC.; ECOTIRE
TREADING, CO, LLC; WOLVERINE
LAND HOLDINGS, LLC; PRIME
FLORAL, LLC.; CAMPUS, INC., and
L.H.P. TRANSPORTATION SERVICES,
INC.**

DEFENDANTS.

CIVIL ACTION NO: 17 – 40166

**PLAINTIFF’S MOTION TO COMPEL
PRODUCTION AND REFORM OR
REMOVE OBJECTIONS IN
RESPONSES OF DEFENDANTS NEW
PRIME, INC., AND BARBARA
CANNON, ADMINISTRATOR OF THE
ESTATE OF JOHN PAUL CANNON**

NOW COMES Plaintiff, Jose Moura, Sr., Personal Representative of the Estate of Jose Moura, Jr., and respectfully requests this Honorable Court order Defendants New Prime, Inc., and Barbara Cannon, Administrator of the Estate of John Paul Cannon to reform or remove improper objections and to produce certain documents identified in Plaintiff’s requests to Defendant New Prime, Inc. numbered 25, 31, and 32; Second Requests to Defendant New Prime numbered 1, 2, 3, 4, 5, 6, 7, and 8; to Defendant Barbara Cannon, Administrator of the Estate of John Paul Cannon, in Plaintiff’s First Request numbered 7, 8, 20, 21, 24, and to compel the response to Plaintiff’s Second Request for Production of Documents.

As grounds therefore:

(1) Plaintiff has detailed the documents requested and expected in response, and Defendants have failed to comply with these requests and the Federal Rules of Civil Procedure.

(2) Defendants have failed to comply with discovery timelines of both the Federal Rules and by agreement.

For further grounds, Plaintiff refers to the attached memorandum of law and accompanying exhibits.

Wherefore, the Plaintiff requests this Honorable Court for an order requiring further responses and supplementation of documents to the enumerated requests and the reformation and removal of improper objections within 30 days of any decision on this motion.

Respectfully Submitted,
Plaintiff,
By their Attorneys,

/s/ Matthieu J. Parenteau, Esq.

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CERTIFICATE OF SERVICE

I, Matthieu J. Parenteau, hereby certify that on June 2, 2020, a true and correct copy of this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and by first-class mail to all non-registered participants, if any.

/s/ Matthieu J. Parenteau

Matthieu J. Parenteau